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JUNE 8, 2016

**VIA ECF**

Honorable Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Victor Zhirzhan, et al. v. AGL Industries, Inc., et al.***  
**Civil Action No. 14 Civ. 07567 (JBW)(PK)**

Dear Judge Kuo:

This office represents plaintiffs in the above-referenced action. In accordance with Your Honor's May 31, 2016 Order, we write on behalf of both parties to update Your Honor regarding the status of the parties' settlement discussions.

While the parties have made significant progress in the past week and continue to negotiate with the aid of a private mediator towards reaching a settlement, the parties need some additional time to bridge the remaining (albeit small) gap and related terms. Accordingly, the parties respectfully request until Friday, June 10, 2016 to further negotiate settlement and report back to the Court.

We appreciate Your Honor's attention to this matter. Should you have any questions regarding this request, please feel free to contact the undersigned.

Respectfully submitted,

*/s/ Taylor B. Graham*

Taylor B. Graham, Esq. of  
PELTON GRAHAM LLC

cc: All counsel (via ECF)